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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ISSAC BALLARD JR., an individual,

CASE NO: 2:20-cv-00955-RFB-NJK

Plaintiff,

v.

RASIER, LLC d/b/a UBER, a Foreign
Corporation; UBER TECHNOLOGIES, INC.
d/b/a UBER, a Foreign Corporation; DOES I –
XX, inclusive; and ROE CORPORATIONS I –
XX, inclusive;

Defendants.

**STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANTS RASIER, LLC
AND UBER TECHNOLOGIES, INC. TO FILE A RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT (FOURTH REQUEST)**

Plaintiff Issac Ballard, Jr. by and through his counsel of record Tracee Duthie, Esq., of Van Law Firm, and Defendants Rasier, LLC (erroneously sued as “RASIER, LLC d/b/a UBER”) and Uber Technologies, Inc., (erroneously sued as “UBER TECHNOLOGIES, INC. d/b/a UBER”) (collectively referred to as “Defendants”) by and through their counsel of record, Karen L. Bashor, Esq. and Virginia T. Tomova, Esq., of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, hereby stipulate and agree that Defendants Rasier, LLC and Uber Technologies, Inc., shall file a responsive pleading to Plaintiff’s complaint on file herein no later than November 5, 2020. On August 5, 2020, Defendants Uber Technologies, Inc. and Rasier, LLC filed the stipulation and order extending time for Defendants Uber Technologies, Inc. and Rasier, LLC to file a responsive pleading to Plaintiff’s Complaint (third request) in this case. **ECF No. 12.** The third request was

1 granted by this Honorable Court on August 5, 2020. **ECF No. 12.** On July 1, 2020, Defendants
2 Uber Technologies, Inc. and Rasier, LLC filed the stipulation and order extending time for
3 Defendants Uber Technologies, Inc. and Rasier, LLC to file a responsive pleading to Plaintiff's
4 Complaint (second request) in this case. **ECF No. 9.** This request was granted by this Honorable
5 Court on July 2, 2020. **ECF No. 10.** Pursuant to the third request, the responsive pleading to the
6 Plaintiff's Complaint is due on September 5, 2020. However, the parties have stipulated that Uber
7 Technologies Inc. and Rasier, LLC are not the proper defendants in this case, and that Allstate
8 Insurance needs to be added as a proper defendant.

9 On June 3, 2020, Plaintiff filed the stipulation and order for the dismissal of Defendants
10 Rasier, LLC and Uber Technologies, Inc. with prejudice and to amend the Plaintiff's Complaint
11 to add Allstate Insurance as the proper litigant and defendant in this case. **ECF No. 7.** On that same
12 day, the Defendants filed the stipulation and order (first request) extending time for Defendants
13 Rasier, LLC and Uber Technologies, Inc. to file a responsive pleading to the Plaintiff's Complaint.
14 **ECF No. 6.** This first request was granted by this Honorable Court on June 4, 2020. **ECF No. 8.**
15 Pursuant to that first request, a responsive pleading to the Plaintiff's Complaint was due on July 2,
16 2020.

17 The fourth extension is requested to allow enough time for the Plaintiff pursuant to the
18 agreement reached between the parties to voluntarily dismiss Defendants Rasier, LLC and Uber
19 Technologies, Inc. from this case and to substitute in Allstate Insurance as the proper party to this
20 litigation. This extension is also requested as the parties are waiting for the ruling by the Honorable
21 Court on the stipulation and order for the dismissal of Defendants Rasier, LLC and Uber
22 Technologies, Inc. with prejudice and to amend the Plaintiff's Complaint to add Allstate Insurance
as the proper litigant and defendant in this case, which was filed on June 3, 2020. **ECF No. 7.**

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This request is made in good faith and not for purposes of delay.

DATED this 3rd day of September, 2020

DATED this 3rd day of September, 2020

**WILSON, ELSE, MOSKOWITZ,
EDELMA & DICKER LLP**

VAN LAW FIRM

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/s/Tracee Duthie
Tracee Duthie, Esq.
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ORDER

IT IS SO ORDERED.

DATED this 04 day of September, 2020.


Nancy J. Koppe
United States Magistrate Judge

Prepared and Respectfully Submitted by:

**WILSON, ELSE, MOSKOWITZ, EDELMA
& DICKER LLP**

BY: /s/Virginia T. Tomova
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